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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
AHMAD ABOUAMMO,  
  
Defendant.

Case No.: CR 19–621 EMC

**UNOPPOSED MOTION AND  
[PROPOSED] ORDER FOR TRAVEL  
FUNDS AND SUBSISTENCE EXPENSES  
PURSUANT TO 18 U.S.C. § 4285**

Ahmad Abouammo, through his attorney, requests funds to permit him to travel from Seattle, Washington to San Francisco, California for his impending resentencing hearing, which is currently scheduled for June 26, 2025, at 9:00 am.

**I. Background Information**

Mr. Abouammo resides in Seattle, Washington, but has an upcoming resentencing hearing in this matter in the Northern District of California, San Francisco Division. The hearing is currently scheduled for June 26, 2025, at 9:00 AM in this Court. He qualifies for appointment of counsel and is financially indigent. He is unable to pay for his own travel to San Francisco for resentencing. He

therefore requires the assistance of the U.S. Marshals to appear for his upcoming court appearance.

Title 18, section 4285 provides in part:

Any judge or magistrate of the United States, when ordering a person released under chapter 207 on a condition of his subsequent appearance before that court . . . in which criminal proceedings are pending, may, when the interests of justice would be served thereby and the United States judge or magistrate judge is satisfied, after appropriate inquiry, that the defendant is financially unable to provide the necessary transportation to appear before the required court on his own, direct the United States marshal to arrange for that person's means of noncustodial transportation or furnish the fare for such transportation to the place where his appearance is required, and in addition may direct the United States marshal to furnish that person with an amount of money for subsistence expenses to his destination, not to exceed the amount authorized as a per diem allowance for travel under section 5702(a) of title 5, United States Code. When so ordered, such expenses shall be paid by the marshal out of funds authorized by the Attorney General for such expenses.

18 U.S.C. § 4285. Funds can be provided to allow for travel when a defendant is financially unable to provide for the costs of travel. *See United States v. Schooff*, 872 F.2d 431 (9th Cir. 1989).

## **II. Request**

The defense respectfully asks the Court to enter an order directing the U.S. Marshal to arrange for Mr. Abouammo's one-way noncustodial transportation and subsistence expenses, so that he may travel from Seattle, Washington, to San Francisco, California, to appear before this Court on June 26, 2025, at 9:00 am, in connection with the above-captioned matter.

Undersigned defense counsel has communicated with the government regarding this request, and the government has indicated it takes no position.

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Dated: May 27, 2025

Respectfully submitted,

JODI LINKER  
Federal Public Defender  
Northern District of California

/S

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ANGELA CHUANG  
Assistant Federal Public Defender

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**[PROPOSED] ORDER FOR TRAVEL  
FUNDS AND SUBSISTENCE EXPENSES  
PURSUANT TO 18 U.S.C. § 4285**

Good cause appearing pursuant to 18 U.S.C. § 4285, IT IS HEREBY ORDERED THAT the United States Marshal arrange one-way noncustodial transportation from Seattle, Washington, to San Francisco, California, for defendant Ahmad Abouammo, in order to allow him to make his required court appearance of June 26, 2025, at 9:00 AM. The Court further directs the United States Marshal to furnish Mr. Abouammo with an amount of money for subsistence expenses to his destination, not to exceed the amount authorized as a per diem allowance for travel under section 5702(a) of title 5, United States Code.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

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EDWARD M. CHEN  
United States District Judge